

AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING
**OFFENSE CHARGED**

18 U.S.C. § 1343 – Wire Fraud

18 U.S.C. §§ 1957 – Engaging in Monetary Transactions in  
Property Derived from Specified Unlawful Activity;

18 U.S.C. § 2253(a) – Criminal Forfeiture

☐ Petty☐ Minor☐ Misdemeanor☒ Felony

PENALTY:

See Attached Sheet.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

CARRIE LYNN GRANT

DISTRICT COURT NUMBER

CR 24 403 AMO

 FILED  
 JUL 18 2024  
 CLERK, U.S. DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA
**DEFENDANT****IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

- 1) ☐ If not detained give date any prior summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4) ☒ On this charge
- 5) ☐ On another conviction } ☐ Federal ☐ State
- 6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer ☐ Yes  
 been filed? ☐ No

 If "Yes"  
 give date  
 filed
DATE OF  
ARREST

Month/Day/Year

Or... if Arresting Agency &amp; Warrant were not

DATE TRANSFERRED  
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

FBI

☐ person is awaiting trial in another Federal or State Court,  
give name of court☐ this person/proceeding is transferred from another district  
per (circle one) FRCrp 20, 21, or 40. Show District
☐ this is a reprosecution of  
 charges previously dismissed  
 which were dismissed on motion  
 of:
☐ U.S. ATTORNEY ☐ DEFENSESHOW  
DOCKET NO.
☐ this prosecution relates to a  
 pending case involving this same  
 defendant
MAGISTRATE  
CASE NO.
☐ prior proceedings or appearance(s)  
 before U.S. Magistrate regarding this  
 defendant were recorded under

Name and Office of Person

Furnishing Information on this form Ismail J. Ramsay

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned) EVAN M. MATEER, AUSA

**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☐ NO PROCESS\* ☒ WARRANT

Bail Amount: No Bail

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

\* Where defendant previously apprehended on complaint, no new summons or  
warrant needed, since Magistrate has scheduled arraignment

Date/Time: Before Judge:

Comments:

PENALTY SHEET  
CARRIE LYNN GRANT

**Counts One to Four: 18 U.S.C. § 1343 – Wire Fraud**

Maximum twenty years' imprisonment (18 U.S.C. § 1343);  
\$250,000 fine (18 U.S.C. § 3571);  
maximum term of supervised release: 3 years (Class C felony – 18 U.S.C. § 3583);  
\$100 special assessment (18 U.S.C. § 3013)

**Count Five: 18 U.S.C. § 1957 – Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity**

Maximum 10 years of imprisonment (18 U.S.C. § 1957(b)(1));  
\$250,000 fine or twice value of criminally derived property involved in transaction (18 U.S.C. §§ 1957(b)(2), 3571(b)(3));  
maximum term of supervised release: 3 years (18 U.S.C. § 3583(b)(2));  
\$100 special assessment (18 U.S.C. § 3013)

**United States District Court**

FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

VENUE: OAKLAND

UNITED STATES OF AMERICA,  
V.

CARRIE LYNN GRANT,

**FILED**  
JUL 18 2024  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

**CR 24 4037 AMO**

DEFENDANT(S).

**INDICTMENT**

18 U.S.C. § 1343 – Wire Fraud;  
18 U.S.C. § 1957 – Engaging in Monetary Transactions in Property Derived from  
Specified Unlawful Activity.

A true bill.

*/s/ Foreperson of the Grand Jury*

Foreman

Filed in open court this 18th day of July 2024.

*Jury L. Garcia 7/18/24*

Clerk

Hon. Donna M. Ryu, Chief Magistrate Judge

Bail, \$ NO PROCESS

*no bail warrant*

ISMAIL J. RAMSEY (CABN 189820)  
Acting United States Attorney

**FILED** *W*  
JUL 18 2024  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CARRIE LYNN GRANT,

Defendants.

CASE NO.

**CR 24 403** | **AMO**

VIOLATIONS:

18 U.S.C. § 1343 – Wire Fraud;  
18 U.S.C. § 1957 – Engaging in Monetary  
Transactions in Property Derived from Specified  
Unlawful Activity;  
18 U.S.C. §§ 981(a)(1)(C), 982 & 28 U.S.C.  
§ 2461(c) – Criminal Forfeiture

OAKLAND VENUE

INDICTMENT

The Grand Jury charges:

Introductory Allegations

At all times relevant to this Indictment:

1. Defendant Carrie Lynn GRANT resided in the Northern District of California.
2. Wells Fargo Bank was a financial institution, as that term is defined in Title 31, United States Code, Section 5312, the deposits of which were insured by the Federal Deposit Insurance Corporation.
3. Charity 1 was a non-profit charity organization based in Walnut Creek, California, within the Northern District of California. Charity 1 provided educational programming in financial literacy,

INDICTMENT



1 work and career readiness, and entrepreneurship to underserved students. Charity 1 was affiliated with a  
2 national organization, Charity 2. Charity 1 made frequent payments to Charity 2 for the use of its brand,  
3 for program materials, and for other services. Charity 1 would pay other vendors for services related to  
4 events, services such as payroll and benefits, and payments for rent. Charity 1 employed a small staff  
5 based in Walnut Creek, and otherwise relied on volunteers to execute its mission. Charity 1 had a  
6 401(k) that allowed employees to make contributions to retirement accounts through deductions from  
7 their salary. Until September 2022, Charity 1's 401(k) program was managed by Automatic Data  
8 Processing, Inc. Beginning in September 2022, the program was managed by TriNet Group, Inc.

9 4. From 2015 to 2023, GRANT was employed by Charity 1. GRANT was initially hired in  
10 May 2015 as an office manager and administrative assistant. Among other duties, GRANT was  
11 responsible for making disbursements to pay Charity 1's expenses, including expenses for events, rent,  
12 payroll, and payments to Charity 2. GRANT was promoted to Senior Finance/HR Manager in August  
13 2022.

14 5. Charity 1 maintained a business checking account at Wells Fargo Bank with an account  
15 number ending in -0247. GRANT was the only person with access to the online account, including the  
16 Wells Fargo Direct Pay system used to initiate ACH (Automated Clearing House) payments. ACH is a  
17 U.S. financial network used for electronic payments and money transfers. Only GRANT and the  
18 President of Charity 1 had authority to sign checks from the account ending in -0247.

19 6. GRANT maintained various personal financial accounts, including a personal checking  
20 account at Wells Fargo Bank, with an account number ending in -9256.

21 The Scheme to Defraud

22 7. Beginning at a date unknown to the grand jury, but no later than November 29, 2017, and  
23 continuing through a date unknown to the grand jury, but to at least October 26, 2023, GRANT  
24 knowingly devised, intended to devise, and carried out a scheme and artifice to defraud as to a material  
25 matter, and to obtain money and property by means of materially false and fraudulent pretenses,  
26 representations, and promises, and by omissions and concealment of material facts with a duty to  
27 disclose.

28 As part of the conspiracy and scheme to defraud:

1           8.       GRANT used her position as finance manager for Charity 1 and her control of Charity  
2 1's Wells Fargo Account to direct fraudulent payments from Charity 1's accounts to her own personal  
3 Wells Fargo Bank account -9256. She did so without authority, and made many false entries and  
4 misrepresentations to further and to conceal her scheme. Additionally, GRANT omitted to inform the  
5 President of Charity 1, or any of its other leadership, despite owing a duty to disclose, that she had  
6 fraudulently initiated payments to herself.

7           9.       Between May 18, 2020, and June 22, 2023, GRANT used her control of Charity 1's -  
8 0247 account to initiate at least 62 fraudulent ACH (Automated Clearinghouse Payments) payments to  
9 her personal -9256 account. GRANT attempted to hide the transfers by entering a fraudulent description  
10 into the ACH system. For most of the payments, GRANT falsely described the payments in the Wells  
11 Fargo Bill Pay system as being made to Charity 2 for program fees, event expenses, or program  
12 materials. In fact, Charity 2's records did not contain any invoices supporting any of the 62 payments.  
13 These 62 fraudulent ACH payments totaled at least \$1,087,181.30. GRANT did not use these funds to  
14 benefit Charity 1 or for the purposes she listed in the ACH descriptions. Instead, as part of her scheme  
15 to defraud, she used these funds for her own benefit, including by spending the funds on luxury travel,  
16 concerts, and tickets to sporting events.

17          10.       Additionally, GRANT also used her authority to sign and deposit checks on behalf of  
18 Charity 1 to defraud Charity 1 of funds. Between November 29, 2017, and March 17, 2020, GRANT  
19 fraudulently deposited at least 20 checks drawn from Charity 1's -0247 account into her personal -9256  
20 account. GRANT listed the payee on these checks as Charity 2. In fact, Charity 2's records did not  
21 contain any invoices supporting any of the 20 checks. Each of the checks had two signatures: GRANT's  
22 and the President of Charity 1. At least some of the signatures of the President of Charity 1 were forged.  
23 Each of the checks was endorsed for deposit in GRANT's -9256 account. The 20 checks deposited into  
24 GRANT's personal account totaled \$503,410.33. GRANT did not use these funds to benefit Charity 1  
25 or for the purposes she listed in on the checks. Instead, as part of her scheme to defraud, she used these  
26 funds for her own benefit, including by spending the funds on luxury travel, concerts, and tickets to  
27 sporting events.

28          11.       GRANT also abused her position as finance manager to defraud Charity 1 of funds

1 intended for deposit in Charity 1's employee's 401(k) accounts. On September 1, 2022, Charity 1  
2 changed payroll providers from ADP, Inc., to TriNet. During a four-month transition period from  
3 September through December 2022, ADP transferred employee 401(k) contributions into Charity 1's  
4 WF Account. It was then Charity 1's responsibility to transfer the funds to TriNet. As finance manager,  
5 it was GRANT's responsibility to make that transfers.

6 12. GRANT did not transfer the employee 401(k) contributions to TriNet at any point  
7 between September and December 2022. As a result, in January 2023, Charity 1 had a surplus of  
8 \$51,709 awaiting transfer to TriNet. Rather than make the transfer to TriNet, on January 18, 2023,  
9 GRANT deposited \$49,325.23 from Charity 1's WF Account ending in -0257 into her personal WF  
10 account ending in -9256, with the description of "BUSINESS BUSINESS ACH TRINET INVOICE  
11 3166." GRANT did not use the funds moved to her account from this January 18, 2023, transfer to  
12 benefit Charity 1 or Charity 1's 401(k). Instead, as part of her scheme to defraud, she used these funds  
13 for her own benefit, including by spending the funds on luxury travel, concerts, and tickets to sporting  
14 events.

15 13. GRANT also used legitimate vendor invoices sent to Charity 1 as cover to defraud  
16 Charity 1 of funds. Instead of paying the legitimate vendor invoices, she fraudulently initiated payments  
17 of Charity 1's funds to her personal account ending in -9256. For example, in 2022, Charity 1 held a  
18 fundraising event at Pebble Beach Resorts ("Pebble Beach"). On February 14, 2023, Pebble Beach sent  
19 Charity 1 an invoice for \$22,355.24. It was GRANT's responsibility to pay this invoice. However,  
20 rather than pay the invoice, on March 17, 2023, GRANT transferred \$22,355.24 to her personal WF  
21 account. In the WF online wire transfer form, GRANT falsely described this payment as being made to  
22 Pebble Beach. GRANT did not use these funds to benefit Charity 1 or for Charity 1's payment to  
23 Pebble Beach Resorts. Instead, as part of her scheme to defraud, she used these funds for her own  
24 benefit, including by spending the funds on luxury travel, concerts, and tickets to sporting events.

25 14. Pebble Beach followed up about the unpaid invoice later in March 2023. GRANT made  
26 two direct pay payments from Charity 1's account ending in -0247 to Pebble Beach's account, the first  
27 on April 10, 2023 for \$19,058.39 and the second on May 11, 2023 for \$3,296.85. The total of the two  
28 payments was \$22,355.24, which was the full amount of the March Pebble Beach invoice. GRANT split



1 this into two payments to conceal that she was paying the exact same invoice at second time.

2 15. GRANT also defrauded Charity 1 in connection with a July 2023 payment for Charity 1's  
3 rent. Charity 1 leased an office in Walnut Creek at a monthly rent of \$8,945.97. On July 18, 2023,  
4 GRANT made a Wells Fargo Direct Pay payment from Charity 1's account ending in -0247 to her  
5 personal account ending in -9256 for \$8,945.97. In the ACH memo line, Grant described the payment  
6 as "WC Rent." GRANT did not use these funds to benefit Charity 1 or for Charity 1's rent payment.  
7 Instead, as part of her scheme to defraud, she used these funds for her own benefit, including by  
8 spending the funds on luxury travel, concerts, and tickets to sporting events.

9 16. Because the property manager of Charity 1's property did not receive Charity 1's July  
10 2023 rent payment, the property manager followed up with GRANT. As a further part of her scheme  
11 and to conceal her actions, GRANT falsely told the property manager that she had made the payment  
12 and sent a copy of the Direct Pay transaction records that included the false WC Rent description. After  
13 further inquiry, GRANT said she would issue a stop payment for the July 18 payment and send the  
14 payment again. There is no evidence she took either step.

15 COUNTS ONE THROUGH FOUR: (18 U.S.C. § 1343– Wire Fraud)

16 17. Paragraphs 1 through 16 of this Indictment are re-alleged and incorporated.

17 18. Beginning at a date unknown to the grand jury, but no later than November 29, 2017, and  
18 continuing through a date unknown to the grand jury, but to at least October 26, 2023, the defendant,

19 CARRIE LYNN GRANT,

20 did knowingly and with the intent to defraud devise and execute, and attempt to execute, a material  
21 scheme and artifice to defraud and to obtain money and property by means of materially false and  
22 fraudulent pretenses, representations, and promises, and by omissions and concealment of material facts  
23 with a duty to disclose.

24 19. On or about the dates set forth below, in the Northern District of California and  
25 elsewhere, for the purpose of executing the scheme and artifice referred to above, and attempting to do  
26 so, the defendants did knowingly transmit and cause to be transmitted writings, signs, signals, pictures,  
27 and sounds in interstate commerce by means of wire communications:



| COUNT | DATE      | ITEM WIRED   |
|-------|-----------|--|
| 1     | 1/6/2023  | ACH transfer of \$28,407.99 from Charity 1 to Wells Fargo Account -9256      |
| 2     | 1/18/2023 | ACH transfer of \$49,325.25 from Charity 1 to Wells Fargo Account -9256      |
| 3     | 4/10/2003 | ACH transfer of \$22,355.24 from Charity 1 to Wells Fargo Account -9256      |
| 4     | 3/17/2020 | ATM check deposit of \$23,834.86 from Charity 1 to Wells Fargo Account -9256 |

Each in violation of Title 18, United States Code, Section 1343.

COUNT FIVE: (18 U.S.C. § 1957 – Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity)

20. Paragraphs 1 through 19 of this Indictment are re-alleged and incorporated.

21. On or about June 23, 2021, in the Northern District of California and elsewhere, the defendant,

CARRIE LYNN GRANT,

did knowingly engage in a monetary transaction by and through a financial institution, in and affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, specifically, a wire transfer of \$105,314.86 from a Wells Fargo Account ending in -9256 to a Bank of Hawaii Guarantee Trust escrow account, such funds having been derived from the specified unlawful activity of wire fraud, in violation of Title 18, United States Code, Section 1957.

FORFEITURE ALLEGATION: (18 U.S.C. §§ 981(a)(1)(C), 982(a), & 28 U.S.C. § 2461(c) – Criminal Forfeiture)

22. All of the allegations contained in this Indictment are re-alleged and fully incorporated herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Sections 981(a)(1)(C) and 982(a), and Title 28, United States Code, Section 2461(c).

23. Upon a conviction for the offenses alleged in Counts One through Four of this Indictment, the defendant,

CARRIE LYNN GRANT,

shall forfeit to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(C), 982(a)(2), and 28 U.S.C.

INDICTMENT

§ 2461(c) all property, real or personal, constituting, and derived from, proceeds the defendants obtained directly and indirectly as the result of those violations, including but not limited to the following:

- (a) a forfeiture money judgment in an amount equal to the total proceeds from the commission of said offenses.

24. If any of the aforementioned property, as a result of any act or omission of the defendants –

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

any and all interest the defendants have in other property shall be vested in the United States and forfeited to the United States pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1).

All in violation of Title 18, United States Code, Sections 981(a)(1)(C) and 982(a); Title 28, United States Code, Section 2461(c); and Rule 32.2 of the Federal Rules of Criminal Procedure.

DATED: July 18, 2024

A TRUE BILL

*/s/ Foreperson of the Grand Jury*  
FOREPERSON

ISMAIL J. RAMSEY  
United States Attorney

*/s/ Evan M. Mateer*  
EVAN M. MATEER  
Assistant United States Attorney

INDICTMENT